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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	
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SANTIAGO QUEZADA SR.,	:	
	:	Case No. 24-22431-shl
	:	
	:	Sub-Chapter V Chapter 11
Debtor.	:	
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STATUS REPORT PURSUANT TO BANKRUPTCY CODE SECTION 1188(C)

TO: HON. SEAN H. LANE,
UNITED STATES BANKRUPTCY JUDGE:

Norma E. Ortiz, a member of Ortiz & Ortiz LLP (“O & O”), proposed counsel to Santiago Quezada Sr.(the “Debtor”), respectfully submits the foregoing as the status report required under 11 U.S.C. §1188(c):

1. The Debtor filed a voluntary Sub Chapter V Chapter 11 petition on May 14, 2024 (the “Petition Date”). Eric Huebscher was appointed as the Subchapter V Trustee (the “Trustee”).

2. Prior to the Petition Date, the Debtor retained Ortiz & Ortiz LLP to serve as Debtor’s counsel. The Debtor is in the process of identifying a firm to serve as the Debtor’s accountant. An application to retain Ortiz & Ortiz LLP (“O & O”) has been provided to the

Office of the U.S. Trustee and will be filed with the court in short order. O & O had no contact with the Debtor or its members prior to its engagement in this case and asserts it qualifies to serve as Debtor's counsel under Bankruptcy Code Section 327.

3. The Debtor attended its initial debtor interview and is required to attend its Section 341 meeting with its creditors on June 17th. The Debtor filed his Schedules of Assets and Liabilities. Schedule A/B will be amended to correct the information previously provided regarding the Debtor's real and personal property. The Debtor's first monthly operating report is due on or after June 17th. He has not completed the report and acknowledges that he will not timely file his first report. Once he determines who will assist him, he will ensure that the subsequent reports are filed on a timely basis.

4. The Debtor wholly owns the interests in two corporate entities: El Tina Fish Market Corp ("Fish Market") and Euros El Tina Restaurant Lounge and Billiards Corp. ("Lounge"). The Lounge is not operating but the Fish Market conducts business. There is an adjacent family-owned restaurant that operates under the name La Tina but the Debtor does not possess the shares or membership interests in that entity. The Debtor has managed La Tina and has received compensation for his management but the beer and wine license for that business is in his son's name, Santiago Quezada, Jr. ("Junior").

5. The Debtor's case was commenced because of the collection efforts of judgment creditor Maria Jose Pizarro (the "Plaintiff"). The Plaintiff was a long-time manager of the Debtor and sued him for, among other things, sexual harassment. The court awarded the Plaintiff \$1,000,000.00 of compensatory damages and \$625,000.00 in punitive damages against the Debtor. Pre-petition counsel to the Debtor believes that there are numerous grounds to succeed in reducing the amount of damages awarded on appeal. The successful prosecution of

this appeal is the cornerstone of the Debtor's reorganization. If the Debtor does not succeed in reducing this judgment, his creditors should receive a significant dividend because of the liquidation value of the Debtor's assets.

6. The Debtor is fully committed to ensuring that he complies with his obligations as a debtor-in-possession. The U.S. Trustee and the Trustee have requested numerous financial documents regarding the two entities in which the Debtor owns an interest, the Debtor has agreed to turn over that information, and the Debtor has been willing to provide information regarding the entity that the Debtor formally managed but does not own.

7. Because the Debtor has been required to turn over information regarding his personal interests, and potentially three entities, the Debtor has not turned over all documents and information requested by the U.S. Trustee and the Trustee as of the date of this writing. However, he continues to gather that information and intends to turnover what has been requested. Moreover, the Debtor owns a number of parcels of property in the Dominican Republic. Upon information and belief, the Debtor owns a lot with a home and three lots that are used to grow vegetables. These lots are all located in rural areas. The Debtor must provide information and a valuation regarding these properties and is in the process of doing so. Obtaining information from the Dominican Republic is more time-consuming than obtaining information in the United States.

8. It is the Debtor's intention to seek confirmation of a plan of reorganization that permits him to operate his businesses and provide creditors with the maximum recovery he can afford and is required under applicable Bankruptcy Law.

10. Finally, Bankruptcy Code Section 1118 requires the Debtor to file a status report 14 days before the initial case conference. I request that the Court excuse the Debtor's delay for

the following reasons: The Debtor attended to a family matter in the Dominican Republic recently and has been absent from New York for the last few weeks. He authorized his son Junior, in the Debtor's absence, to assist in prosecuting the case and Junior has done so. However, because of the lengthy document requests from the U.S. Trustee and the Trustee, the undersigned has focused on obtaining and turning over documents in advance of the Section 341 meeting and required this information to provide a fulsome status report to the Court.

Dated: New York, New York
June 13, 2024

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